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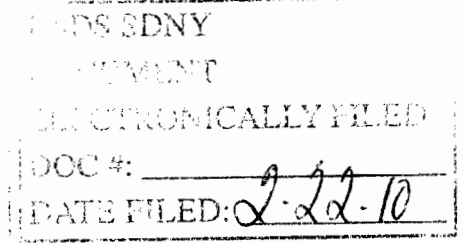
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November 19, 2009



By Hand

The Honorable Victor Marrero
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Terra Securities ASA Konkursbo, et al. v. Citigroup Inc., et al., No. 09 Civ. 7058

Dear Judge Marrero:

I am writing with respect to Defendants' pending motion to dismiss on the grounds of *forum non conveniens* and lack of subject matter jurisdiction. On November 5, Your Honor ordered the scheduling of an evidentiary hearing on the very narrow issue of where various documents were created. I am pleased to report that the parties have worked out a procedure to obviate the need for a hearing. We believe that this will be more efficient for the parties and the Court, which we understand has a heavy trial calendar.

Specifically, the parties have agreed to submit the enclosed document, which identifies where various documents were created. The parties have agreed to stipulate to the information in the chart for purposes of the pending motion. We submit that Your Honor can use this information, along with the parties' previous submissions to decide the pending motions on the merits.

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

The Honorable Victor Marrero

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We hope this procedure is satisfactory for the Court. Please let the parties know if you require additional information.

Respectfully submitted,

John Baughman /aw

John F. Baughman

cc: Michael M. Fay, counsel to Plaintiffs

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|---|--------------------------|
| <i>The Clerk of Court is directed to enter into the public record of this action the letter from defendants herein on behalf of the parties</i> | |
| SO ORDERED: | <i>[Signature]</i> |
| <i>2-22-10</i> | |
| DATE | VICTOR MARRERO, U.S.D.J. |